



**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

D.T.C. 21-1

April 15, 2021

Petition of Starlink Services, LLC for Designation as an Eligible Telecommunications Carrier.

**SECOND SET OF INFORMATION REQUESTS
OF THE DEPARTMENT OF TELECOMMUNICATIONS AND CABLE
TO STARLINK SERVICES, LLC**

Pursuant to 207 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Cable (“Department”) submits to Starlink Services, LLC (“Starlink”) the following information requests:

Instructions

1. Each request should be answered in writing on a separate page with a recitation of the request, a reference to the request number, the docket number of the case, and the name of the person responsible for the answer.
2. This request should be treated as a rolling information request. Do not wait for all answers to be completed before supplying answers. Provide each answer to the Department as soon as it is available.
3. These requests shall be deemed continuing so as to require further supplemental responses if Starlink or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term “provide complete and detailed documentation” means: Provide all data, assumptions, and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions

were used in developing the projections or estimates. Provide and explain all supporting workpapers.

5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, press releases, handwritten and/or typed notes, records, reports, bills, checks, articles from journals and/or other sources, e-mails, SMS text messages, blog postings, RSS feeds, web pages, social media postings such as Facebook and Twitter, and/or other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. The term “certify” means to provide a sworn certification by the appropriate corporate officer.
7. The term “Affiliate” means a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, Starlink. For purposes of this definition, the term “own” means to own an equity interest (or the equivalent thereof) of more than 10 percent.
8. The term “person” includes an individual, partnership, association, joint-stock company, trust, or corporation.
9. The term “Starlink” includes Starlink and any Affiliate.
10. The term “RDOF” means the federal Rural Digital Opportunity Fund.
11. The term “ETC” means eligible telecommunications carrier.
12. The term “Petition” refers to Starlink’s application for ETC designation in the above-captioned proceeding.
13. The term “FCC” means the Federal Communications Commission.
14. The term “RDOF Census Blocks” means those census blocks listed in Exhibit 1 of the Petition.
15. The term “Community Anchor Institutions” means schools, libraries, medical and healthcare providers, public safety entities, community colleges and other institutions of higher education, and other community support organizations and agencies that provide outreach, access, equipment, and support services to facilitate greater use of broadband service by vulnerable populations, including low-income, the unemployed, and the aged.
16. If any one of these requests is ambiguous, notify the Department so that the request may be clarified prior to the preparation of a written response.

17. File the responses with Shonda D. Green, Secretary of the Department, not later than 5:00 P.M. on **April 29, 2021**.

Requests

- D.T.C. 2-1 Please refer to Starlink’s response to D.T.C. 1-10. Starlink states, “[s]pecifically, Starlink Services will, at a minimum, offer service to 40% of the awarded locations statewide by the end of the third full calendar year following funding authorization, and 20% each year thereafter, resulting in 100% deployment to funded locations by the end of the sixth calendar year.” Starlink further notes the deployment schedule is provided in response to D.T.C. 1-1 in the FCC Form 683 attachments. Please also refer to Starlink’s response to D.T.C. 1-4. Starlink’s chart shows there are 11,136 statewide locations in the RDOF Census Blocks. Please explain the difference between the total statewide number presented in D.T.C. 1-4 and the statewide number presented on the deployment schedule filed in D.T.C. 1-1 representing “100% deployment to funded locations by the end of the sixth calendar year.”
- D.T.C. 2-2 In its answers to D.T.C. 1-7, D.T.C. 1-8, and D.T.C. 1-9, Starlink stated that its response was on behalf of Starlink Services, LLC and its parent entity, Space Exploration Technologies Corp. Please refer to Starlink’s confidential attachment 1-1-683-1 showing its FCC Form 683 submission, and clarify whether its answers to D.T.C. 1-7, D.T.C. 1-8, and D.T.C. 1-9 are also on behalf of all the businesses listed under the “FCC Regulated Businesses of this Applicant” section. If not, please provide an answer to D.T.C. 1-7, D.T.C. 1-8, and D.T.C. 1-9 for these entities.
- D.T.C. 2-3 Following up on Starlink’s response to D.T.C. 1-11, please explain in detail what is meant by “tier 3 and tier 4 support.” Please also identify and define tier 1 support, tier 2 support, and any other support tiers Starlink uses as part of its provision of customer service.
- D.T.C. 2-4 Following up on Starlink’s response to D.T.C. 1-11, please identify and describe the customer service metrics Starlink is and will be tracking to determine the performance of its customer service department. Please also identify the performance targets for each of those metrics (e.g., target response times to answering calls, and target resolution times to solving customer queries).
- D.T.C. 2-5 Following up on Starlink’s response to D.T.C. 1-11, please provide greater detail on Starlink’s planned phone-based customer support, including but not limited to how it allows consumers to contact Starlink with inquiries and complaints, its organizational structure, and its planned hours of operation.
- D.T.C. 2-6 Following up on Starlink’s response to D.T.C. 1-12, Starlink states that it plans to implement a performance measurement system to report upload and download speeds. Please provide greater detail on Starlink’s performance measurement

system, including but not limited to whether the system will be publicly accessible, and where the system will be hosted.

- D.T.C. 2-7 Please identify any countries other than the United States in which Starlink currently offers voice or broadband services.
- D.T.C. 2-8 Following up on Starlink’s response to D.T.C. 1-16, please clarify whether the “24-hour battery backup option for user equipment that will provide the ability to make phone calls in the event of a power outage” will carry any additional costs or requirements for customers.
- D.T.C. 2-9 Following up on Starlink’s response to D.T.C. 1-20, please refer to www.starlink.com/legal/specifications-public-beta and the following language: “Like other novel technology products, the Starlink Kit will eventually become technologically obsolete. From time to time, customers may need to purchase a newer model for optimal Services.” Please describe the expected product lifespan for the Starlink Kit, how Starlink will determine when the Kit becomes obsolete, and how Starlink will notify its customers when the Kit becomes obsolete.
- D.T.C. 2-10 Following up on Starlink’s response to D.T.C. 1-20, please clarify who will be responsible for the cost of repairs or replacements should any part of the Starlink Kit stop working.
- D.T.C. 2-11 Following up on Starlink’s answer to D.T.C. 1-21, please provide an update or clarify when Starlink anticipates making a decision regarding which MSPs it will use or whether it will develop its own VoIP solution.
- D.T.C. 2-12 Following up on Starlink’s answer to D.T.C. 1-23, please provide an update or clarify when Starlink anticipates it will be able to supplement its response.
- D.T.C. 2-13 Following up on Starlink’s answer to D.T.C. 1-24, regardless of whether any service lost was system-wide, partial, or individual to a customer or group of customers, please disclose the number of Starlink broadband customers in the United States that experienced an outage(s) during 2020 and 2021, and the average duration of such outages.
- D.T.C. 2-14 Following up on Starlink’s answer to D.T.C. 1-25, please refer to Starlink’s confidential Spectrum Access Attachment and state which gateway sites serve or will serve customers in Massachusetts.
- D.T.C. 2-15 Please explain whether Starlink anticipates being able to offer service to Community Anchor Institutions in its service territory.